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June 7, 2004

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Sid Roche, Esq.
Assistant General Counsel
Federal Election Commission
999 E. St., N.W.
Washington, DC 20463

Re: Federal Election Violation
Michael Watts

MUR 5453

Dear Mr. Roche:

Per our telephone conversation, my client, Michael Watts of West Hartford, CT requested that I inform the Federal Election Commission that he believes that he has violated the Federal Election Campaigns Act, FECA, in particular, Title 2, U.S.C., Section 441a and/or 441b, Limitations on Contributions and Expenditures.

At the time period in question, April of 2000, Mr. Watts was employed by The Watson Group, nee Arthur A. Watson and Co., of Wethersfield, CT. In particular, while working as an employee of said company on behalf of Republican senate candidate Philip A. Giordano, the former mayor of Waterbury, CT., he did approach his employer and four fellow employees about contributing to the campaign.

Mr. Watts and his wife, along with said four other employees and spouses contributed to the campaign. The Watson Group apparently decided one way or another to secretly reimburse each of the families that gave the \$2,000 donation. (My client did report the income.)

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Sid Rocke, Esq.

June 7, 2004

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Mr. Watts sincerely regrets being involved in this attempt to circumvent federal election laws. The amount involved was not great but he now realizes that any such effort undermines the intent and will of the Congress. He was not the person who on the Watson Group's part, made the decision to reimburse him and the other employees, but he did help collect the funds that, but for the reimbursement issue, would have been legal contributions. With or without reimbursement, it was his intent to donate said money (\$2,000). His wife did not know of the unlawful reimbursement.

Mr. Watts who has no political position or political history, is prepared to be penalized for his wrongdoing. He does hope that in deciding a fair resolution that your office consider the fact that he has no prior history of wrongdoing; he made no profit in this matter (other than the \$2,000 reimbursement); and he is presenting this information to you before any official from FEC knew of this matter.

Please feel free to contact me in order to properly proceed in this matter.

Sincerely,



Richard R. Brown

RRB:dwr

cc: Michael Watts

P.S. Notwithstanding my client's specific instructions that I contact you, I do note that more than four years has elapsed in this matter (April 2000) as the criminal limitation in effect at that time was three years. See 2 U.S.C., Section 455. It is unclear if the civil limitation of action may preclude recovery in this matter. Your thoughts on this issue would be appreciated. - RRB

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